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Attorneys for Defendant  
FIA CARD SERVICES

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

TATIANA OLMOS, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

FIA CARD SERVICES, N.A., a  
national bank,

Defendant.

Case No. 15-cv-2786 BAS BGS

**JOINT MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT**

Judge: Hon. Cynthia Bashant  
Ctm: 4B

Pursuant to Local Rule 12.1 of the Local Rules of Practice for the United States District Court for the Southern District of California, Plaintiff Tatiana Olmos (“Plaintiff”) and Defendant FIA Card Services, N.A. (“Defendant”) hereby move and request that Defendant be granted an extension of time until February 8, 2016, to answer or to otherwise respond to Plaintiff’s Complaint.

The extension of time is supported by good cause. The Complaint was filed on December 10, 2015. Defendant was served with the Complaint on December 14, 2015, and its response to the Complaint is currently due on January 4, 2016. The requested extension will provide Defendant additional time to investigate

1 plaintiff's allegations and prepare a response to the Complaint. This is the first  
2 request for an extension of time for Defendant to respond to the Complaint.

3 Therefore, the parties respectfully request that the Court enter an Order  
4 extending the time for Defendant to respond to the Complaint until February 8,  
5 2016.

6 **ECF ATTESTATION**

7 I, Jessica Roberts, am the ECF user whose ID and password are being used to  
8 file this Joint Motion for Extension of Time to Respond to Complaint. I hereby  
9 attest that Benjamin H. Richman has concurred in this filing.

10  
11 Dated: December 30, 2015 MORRISON & FOERSTER LLP

12  
13 By: /s/ Jessica Roberts  
14 JESSICA ROBERTS  
JRoberts@mofo.com

15 Attorneys for Defendant  
16 FIA CARD SERVICES

17 Dated: December 30, 2015 EDELSON PC

18  
19 By: /s/ Benjamin H. Richman  
20 Benjamin H. Richman  
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21 J. DOMINICK LARRY  
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22 Attorneys for Plaintiff  
23 TATIANA OLMOS  
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26  
27  
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**CERTIFICATE OF SERVICE**

I certify that on December 30, 2015, I caused a copy of the foregoing to be filed electronically and that the document is available for viewing and downloading from the ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

By: /s/ Jessica Roberts  
JESSICA ROBERTS  
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